

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, <i>et al.</i> ,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	Case No. 5:21-cv-844-XR
	§	[Lead Case]
GREGORY W. ABBOTT, <i>et al.</i> ,	§	
	§	
<i>Defendants.</i>	§	

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LEAGUE OF UNITED LATIN AMERICAN CITIZENS, <i>et al.</i> ,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	Case No. 1:21-cv-786
	§	[Consolidated Case]
JOHN SCOTT, <i>et al.</i> ,	§	
	§	
<i>Defendants.</i>	§	

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**EXHIBIT I**

**DECLARATION OF REPRESENTATIVE ANDREW MURR**

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,

*Plaintiffs,*

v.

GREG ABBOTT, *et al.*,

*Defendants.*

§  
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§

Case No. 5:21-cv-00844  
[Lead Case]

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HOUSTON AREA URBAN LEAGUE, *et al.*,

*Plaintiffs,*

v.

GREG ABBOTT, *et al.*,

*Defendants.*

§  
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Case No. 5:21-cv-00848  
[Consolidated Case]

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**DECLARATION OF REPRESENTATIVE ANDREW MURR**

Pursuant to 28 U.S.C. § 1746, I, Andrew Murr, declare under penalty of perjury that the foregoing is true and correct.

1. My name is Andrew Murr. I am the elected representative for District 53 of the Texas House of Representatives. I have held office since January of 2015.
2. In connection with the consolidated cases *La Unión del Pueblo Entero v. Abbott*, No. 5:21-cv-844 (W.D. Tex.), I received a subpoena *duces tecum* from the LULAC plaintiffs. I understand that the plaintiffs have objected to my attorneys' withholding of several documents that were collected from my office.
3. As my attorneys have indicated, I intend to assert the legislative privilege, attorney-client privilege, work-product privilege, the investigative privilege, and any applicable privileges to the greatest extent allowable by law. This declaration confirms the assertions my attorneys made on my behalf in the privilege log they sent to plaintiffs. The references to *entries* and *tables* mean the same entries and tables listed in plaintiffs' compilation of objections to privilege assertions. *See* ECF 392 at App 244–85.

4. The entries listed below refer to notes prepared by myself or members of my staff relating to SB1, or other election integrity legislation considered during sessions of the 87th Legislature, as indicated by the privilege log. These notes reflect my mental impressions regarding their subject, and are intended to be strictly confidential.
  - See Table A, Entries 28–33, 35, 40, Table B, Entry 12.
5. The entries listed below refer to documents that are contained within my so-called bill book, as indicated by the privilege log. My bill book is a compilation of documents that I collected as part of my process for gathering facts for, considering, and formulating SB1, or other election integrity legislation considered during sessions of the 87th Legislature. I regularly refer to my bill book when considering such legislation, answering questions about the same, or preparing for hearings or debates. My bill book is intended to be kept strictly confidential and reveals my mental impressions regarding the legislation that it is intended to address.
  - See Table A, Entries 34, 36–42.
6. The entries listed below refers to a reports or analyses that my office retained, as indicated by the privilege log. In the course of my legislative duties, I receive reports and analyses from many different groups. I choose to retain some of these reports and analyses as part of my process for gathering facts for, considering, and formulating SB1, or other election integrity legislation considered during sessions of the 87th Legislature, although in doing so I do not necessarily agree or disagree with the substantive assertions they make. These reports are authored by a variety of organizations. Some of these reports are also contained within my bill book. And some of these reports contain annotations made by myself or members of my staff, which reflect our mental impressions regarding the report or analysis at issue.
  - See Table A, Entry 34, Table B, Entries 5–11.
7. The entries listed below refer to drafts of bills relating to election integrity, draft amendments, and draft committee substitutes, as indicated by the privilege log. Some of the relevant documents contain annotations made by myself or members of my staff, which reflect our mental impressions regarding the report or analysis at issue. My staff and I prepared these draft documents as part of my process for considering and formulating SB1, or other election integrity legislation considered during sessions of the 87th Legislature. They directly relate to sections and provisions that were considered for such legislation. I do not necessarily think that any such draft, section, or provision is good or bad policy or should or should not have been incorporated into what ultimately became Senate Bill 1.
  - See Table A, Entries 32–33, 36, 39–40.
8. The entries listed below refer to draft scripts or talking points, as indicated by the privilege log. These are documents that summarize or set forth the topics intended to discuss, or was considering discussing, when introducing, presenting, discussing, or asking questions about legislation in committee or on the House floor as to SB1, or

other election integrity legislation considered during sessions of the 87th Legislature. These documents are strictly confidential and reveal my mental impressions regarding the particular subject and legislation at issue.

- See Table A, Entries 37–38, 41.

9. I gave a deposition in connection with this litigation on Thursday, May 5, 2022. All parties to these consolidated lawsuits were entitled to appear and ask questions. No attorney asked me any questions relating to the privilege log produced by my counsel respecting the documents withheld in connection with the subpoena issued to me. In addition, to my knowledge, no attorney representing the LULAC plaintiffs asked me any questions at all.

Executed on May 6, 2022

A handwritten signature in black ink, appearing to read "Andrew Murr". The signature is written in a cursive, flowing style.

Andrew Murr